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Attorneys for Defendant
BRENDA M. O. CHUNG (02)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 02-00225DAE(02)
)	
Plaintiff,)	DEFENDANT CHUNG'S (02)
)	PROPOSED SUPPLEMENTAL
vs.)	JURY INSTRUCTION;
)	CERTIFICATE OF SERVICE
ANDY S. S. YIP, (01))	
BRENDA M. O. CHUNG, (02))	Trial: August 15, 2007
)	Judge: David Alan Ezra
Defendants.)	
)	
)	

DEFENDANT CHUNG'S (02) PROPOSED
SUPPLEMENTAL JURY INSTRUCTION

Defendant Brenda M. O. Chung (02), hereby respectfully requests pursuant to LR51.1 and CrimLR30.1, that in addition to the agreed upon instructions and the court's standard instructions, that the jury also be given the attached proposed supplemental instruction.

DATED: Honolulu, Hawaii, September 11, 2007.

/s/ Howard K. K. Luke
HOWARD K. K. LUKE
DAVID M. HAYAKAWA

Attorneys for Defendant
BRENDA M. O. CHUNG (02)

DEFENDANT CHUNG'S (02) PROPOSED
SUPPLEMENTAL JURY INSTRUCTION NO. 4

Multiple Conspiracies

You must decide whether the conspiracy charged in the indictment existed, and, if it did, who at least some of its members were. If you find that the conspiracy charged did not exist, then you must return a not guilty verdict, even though you may find that some other conspiracy existed. Similarly, if you find that any defendant was not a member of the charged conspiracy, then you must find that defendant not guilty, even though that defendant may have been a member of some other conspiracy.

Ninth Circuit Model Criminal Jury Instructions No. 8.17

GIVEN _____
REFUSED _____
MODIFIED _____

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COURT'S INSTRUCTION NO. ____

You must decide whether the conspiracy charged in the indictment existed, and, if it did, who at least some of its members were. If you find that the conspiracy charged did not exist, then you must return a not guilty verdict, even though you may find that some other conspiracy existed. Similarly, if you find that any defendant was not a member of the charged conspiracy, then you must find that defendant not guilty, even though that defendant may have been a member of some other conspiracy.